

1 [Counsel for filing parties listed on signature pages]
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7 UNITED STATES DISTRICT COURT
8 FOR THE NORTHERN DISTRICT OF CALIFORNIA

9
10 LENOVO (UNITED STATES) INC. and
11 MOTOROLA MOBILITY, LLC,

12 *Plaintiffs,*

13 v.

14 IPCOM GMBH & CO., KG,

15 *Defendant.*
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Case No. 19-cv-01389-EJD-VKD

**JOINT STATUS REPORT ON THE
STATUS OF JURISDICTIONAL
DISCOVERY**

1 Pursuant to the Court's Order of February 14, 2020 (Dkt. 80), plaintiffs Lenovo
2 (United States) Inc. and Motorola Mobility, LLC ("Plaintiffs") and defendant IPCom
3 GmbH & Co., KG ("IPCom" or "Defendant," and together with Plaintiffs, the "parties"),
4 hereby submit the following brief, non-argumentative status report describing the status of
5 jurisdictional discovery.

6 **1. The February 11, 2020 Discovery Hearing and Orders**

7 On February 11, 2020, the Court (Judge DeMarchi presiding) held a hearing on the
8 parties' discovery disputes concerning Plaintiffs' proposed document requests for personal
9 jurisdiction discovery and IPCom's proposed interrogatory to Plaintiffs. The Court denied
10 IPCom's proposed interrogatory to Plaintiffs. (Dkt. 79.) The Court issued an Order
11 providing guidelines regarding the permissible scope of discovery and required the parties
12 to confer further regarding Plaintiffs' document requests. (Dkt. 80.) The Court stated that
13 its Order was without prejudice to the parties submitting another joint discovery dispute
14 letter after they complied with the Court's directions concerning meeting and conferring
15 about the document requests. The Court instructed the parties to provide an update on the
16 status of discovery by February 28, 2020.

17 **2. Subsequent Developments**

18 On February 25, 2020, Plaintiffs sent IPCom revised document requests pursuant to
19 the Court's February 14, 2020 order. The parties are continuing to confer regarding the
20 personal jurisdiction document requests in light of the Court's guidance, and will provide
21 another update by March 13, 2020, at the latest.

22 IPCom agreed to begin a rolling production of documents responsive to those
23 requests to which it had agreed to respond. To date, Plaintiffs have made two productions
24 of documents, of 134 pages.

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Respectfully submitted,

Dated: February 28, 2020

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By /s/ Tenaya Rodewald

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MOTOROLA MOBILITY, LLC

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1 Dated: February 28, 2020

MINTZ LEVIN COHN FERRIS GLOVSKY AND
POPEO P.C.

3 By /s/ Philip C. Ducker

4 Stephen J. Akerley (Bar No. 160757)

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13
14 **FILER'S ATTESTATION**

15 Pursuant to Civil L.R. 5-1(i)(3) regarding signatures, I, Tenaya Rodewald,
16 attest that concurrence in the filing of this document has been obtained from each
17 of the other signatories. I declare under penalty under the laws of the United States
18 of America that the foregoing is true and correct. Executed this 28th day of February,
19 2020, at Palo Alto, California.

20 /s/ Tenaya Rodewald
21 Tenaya Rodewald
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